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CD:DEW  
F.#2003R01893

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

INDICTMENT

UNITED STATES OF AMERICA

- against -

MACK ANDINO,  
LAWRENCE BRIGGS,  
also known as "Jamal" and  
"Rahmel," and  
CHALITA DRAYTON,

Defendants.

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §§ 286,  
287, 2 and 3551 et seq.)

CLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
FILED  
2005 MAR 29 PM 3:14

THE GRAND JURY CHARGES:

COUNT ONE

In or about and between January 2000 and April 2003,  
both dates being approximate and inclusive, within the Eastern  
District of New York and elsewhere, the defendants MACK ANDINO,  
LAWRENCE BRIGGS, also known as "Jamal" and "Rahmel," and CHALITA  
DRAYTON, together with others, did knowingly and willfully  
conspire to defraud an agency of the United States, to wit: the  
Internal Revenue Service ("IRS"), by obtaining and aiding others  
to obtain the payment of false, fictitious and fraudulent claims,  
to wit: tax refunds.

(Title 18, United States Code, Sections 286 and 3551 et  
seq.)

COUNTS TWO THROUGH FIFTEEN

On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendants MACK ANDINO, LAWRENCE BRIGGS, also known as "Jamal" and "Rahmel," and CHALITA DRAYTON, together with others, did knowingly and intentionally make and present claims upon and against an agency of the United States, to wit: the IRS, which claims the defendants knew to be materially false, fictitious and fraudulent, in that the defendants listed below filed and caused to be filed with the IRS fraudulent Individual Income Tax Returns in the names of the taxpayers listed below, whose identities are known to the Grand Jury, which returns claimed refunds of taxes in the amounts listed below, knowing such claims to be false, fictitious and fraudulent:

| COUNT | DEFENDANTS         | TAXPAYER NAME   | TAX YEAR | DATE FILED     | REFUND CLAIM |
|-------|--------------------|-----------------|----------|----------------|--------------|
| TWO   | ANDINO             | John Doe #1     | 1999     | April 15, 2000 | \$4,779      |
| THREE | ANDINO             | John Doe #1     | 2000     | April 15, 2001 | \$5,250      |
| FOUR  | ANDINO             | Jane Doe #1     | 1999     | April 15, 2000 | \$1,822      |
| FIVE  | ANDINO and BRIGGS  | Jane Doe #2     | 2001     | April 15, 2002 | \$4,011      |
| SIX   | ANDINO and BRIGGS  | Jane Doe #3     | 2002     | April 15, 2003 | \$4,892      |
| SEVEN | ANDINO and BRIGGS  | Jane Doe #4     | 2001     | April 15, 2002 | \$3,379      |
| EIGHT | ANDINO and BRIGGS  | Jane Doe #5     | 2002     | April 15, 2003 | \$1,433      |
| NINE  | ANDINO and DRAYTON | CHALITA DRAYTON | 2000     | April 15, 2001 | \$1,665      |

| COUNT    | DEFENDANTS         | TAXPAYER NAME   | TAX YEAR | DATE FILED     | REFUND CLAIM |
|----------|--------------------|-----------------|----------|----------------|--------------|
| TEN      | ANDINO and DRAYTON | CHALITA DRAYTON | 2001     | April 15, 2002 | \$1,321      |
| ELEVEN   | ANDINO and DRAYTON | CHALITA DRAYTON | 2002     | April 15, 2003 | \$2,080      |
| TWELVE   | ANDINO and DRAYTON | John Doe #2     | 2000     | April 15, 2001 | \$2,814      |
| THIRTEEN | ANDINO and DRAYTON | John Doe #2     | 2001     | April 15, 2002 | \$2,063      |
| FOURTEEN | ANDINO and DRAYTON | Jane Doe #6     | 2001     | April 15, 2002 | \$1,425      |
| FIFTEEN  | ANDINO and DRAYTON | Jane Doe #6     | 2002     | April 15, 2003 | \$1,997      |

(Title 18, United States Code, Sections 287, 2 and 3551  
et seq.)

A TRUE BILL

FOREPERSON

*Roslynn R. Mauskopf*  
ROSLYNN R. MAUSKOPF  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

